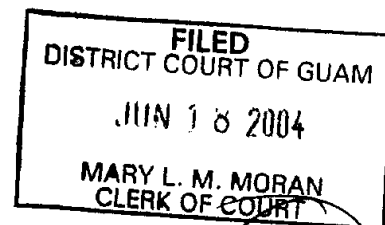


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Attorneys for Plaintiff  
LA-RESA BLAS



IN THE UNITED STATES DISTRICT COURT

LA-RESA BLAS,

CIVIL CASE NO. 03-00027

Plaintiff,

vs.

IMPERIAL SUITES, INC,  
d/b/a IMPERIAL SUITES HOTEL,

~~PROPOSED~~ <sup>2nd</sup> SECOND  
AMENDED SCHEDULING  
ORDER

Defendant.

~~PROPOSED~~ <sup>2nd</sup> SECOND AMENDED SCHEDULING ORDER

Pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure, and Rule 16.1 of the Local Rules of Practice for the District Court of Guam, the parties hereby submit the following Proposed Second Amended Scheduling Order:

1. The nature of the case is as follows:  
Title VII Employment, Sexual Battery and/or Assault.
2. The posture of the case is as follows:
  - a) The following motions are on file (pending):  
None.

**La-Resa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato, Civil Case No. 03-00027**  
**Proposed Second Amended Scheduling Order**  
**June 14, 2004**

b) The following formal discovery has been initiated:

Discovery has been conducted.

3. All Motions to add parties and claims shall be filed on or before:

No parties or claims shall be added.

4. All Motions to amend pleadings shall be filed on or before:

September 17, 2004.

5. Status of Discovery:

The Discovery Plan (filed concurrently herewith) is adopted and incorporated as part of this Proposed Second Amended Scheduling Order.

6. ~~The parties shall appear before the District Court on~~                      <sup>July</sup> ~~at~~                     

~~for the Scheduling Conference.~~

7. The discovery cut-off date (defined as the last day to file responses to discovery) is: September 1, 2004.

8. a) The anticipated discovery motions are:

None at this time.

b) All discovery motions shall be filed on or before September 7, 2004. These motions will be heard on or before September 24, 2004.

c) All dispositive motions shall be filed on or before October 8, 2004 and heard on or before October 26, 2004.

**La-Resa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato, Civil Case No. 03-00027**  
**Proposed Second Amended Scheduling Order**  
**June 14, 2004**

9. The prospects for settlement are:

Unknown at this time.

10. The Preliminary Pretrial Conference shall be held on October 26, 2004 at 3:15 p.m. (no later than 21 days to trial date).

11. The parties' pretrial materials, discovery materials, witness lists, designations and exhibit lists shall be filed on or before November 2, 2004 (no later than 14 days prior to Trial).

12. The Proposed Pretrial Order shall be filed on or before November 2, 2004 (no later than 14 days prior to Trial).

13. The Final Pretrial Conference shall be held on November 9, 2004 at 3:00 p.m. (no later than 7 days prior to Trial).

14. The Trial shall be held on November 16, 2004 at 9:30 a.m.

15. The Plaintiff seeks a jury trial.

16. It is anticipated that it will take two to three (2-3) days to try this case.

17. The names of counsel on this case are:

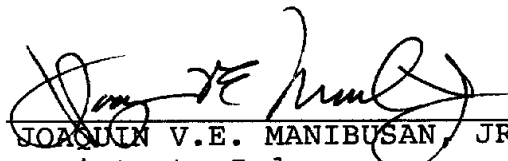
William L. Gavras, Esq. for Plaintiff La-Resa Blas

Jehan'Ad G. Martinez, Esq. for Imperial Suites, Inc. dba  
Imperial Suites Hotel

**La-Resa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato, Civil Case No. 03-00027**  
**Proposed Second Amended Scheduling Order**  
**June 14, 2004**

18. The Parties are amenable to submitting this case to a settlement conference.
19. The parties present the following suggestions for shortening trial:  
None at this time.
20. The following issues will affect the status or management of the case:  
Unknown at this time

Dated: June 18, 2004.

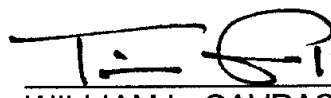
  
JOAQUIN V.E. MANIBUSAN, JR.  
Magistrate Judge

**APPROVED AS TO FORM AND CONTENT:**

LAW OFFICES OF GORMAN & GAVRAS

Date: June 14, 2004

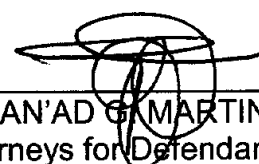
BY:

 *Per*  
WILLIAM L. GAVRAS, ESQ.  
Attorneys for Plaintiff  
LA-RESA BLAS

KLEMM, BLAIR, STERLING & JOHNSON

Date: June 16, 2004.

BY:

  
JEHAN'AD G. MARTINEZ, ESQ.  
Attorneys for Defendant  
IMPERIAL SUITES, INC, dba IMPERIAL SUITES HOTEL

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**Attorneys for Plaintiff**  
**LA-RESA BLAS**

**IN THE UNITED STATES DISTRICT COURT**

**LA-RESA BLAS,**

**CIVIL CASE NO. 03-00027**

**Plaintiff,**

**vs.**

**IMPERIAL SUITES, INC,**  
**d/b/a IMPERIAL SUITES HOTEL,**

**SECOND AMENDED**  
**DISCOVERY PLAN**

**Defendant.**

\_\_\_\_\_ /

**AMENDED DISCOVERY PLAN**

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rule 16.2, the parties agree to and hereby submit the following plan:

A. Depositions of fact witnesses may begin at once and be taken as needed, prior to the discovery cutoff date. Some of the parties may call expert witnesses in this case.

B. Unless additional discovery is ordered by the Court, the parties also may propound one set each of interrogatories (25 maximum) and requests for admissions (25 maximum). Requests for production may also be propounded. This discovery shall be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

**LaResa Blas v. Imperial Suites, Inc, dba Imperial  
Suites Hotel and Bong Robato, CV 03-00027**  
**Second Amended Discovery Plan**  
**June 14, 2004**

C. The parties, except as otherwise noted, agree to provide all pre-discovery and preliminary discovery mandated by Local Rules and FRCP Rule 26 by May 18, 2004. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is on-going.

D. All parties will exchange names and reports (if any) of expert witnesses on or before July 18, 2004.

E. The specific subjects on which discovery may be needed are:

Facts supporting the nature of the claims and defenses.

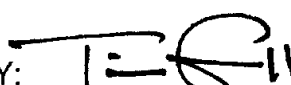
F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the Federal and Local Rules.

G. The Cutoff date for discovery is September 1, 2004.

**APPROVED AS TO FORM AND CONTENT:**

LAW OFFICES OF GORMAN & GAVRAS

Date: June 14, 2004.

BY:  *for*  
WILLIAM L. GAVRAS, ESQ.  
Attorneys for Plaintiff  
LA-RESA BLAS

KLEMM, BLAIR, STERLING & JOHNSON

Date: June 16, 2004.

BY:   
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IMPERIAL SUITES, INC, dba IMPERIAL  
SUITES HOTEL